

Attachment 2

15-Day Modifications

[Note: Amendments proposed with the 45-day notice are shown in single underline to indicate additions and ~~single strikeout~~ to indicate deletions from the existing text, while new amendments proposed with these staff suggested modifications are shown in double underline to indicate additions and ~~double strikeout~~ to indicate deletions from existing text.]

Proposed Amendments to Method 310: Determination of Volatile Organic Compounds (VOC) in Consumer Products and Reactive Organic Compounds in Aerosol Coating Products

(Including Appendices A and B)

Adopted: September 25, 1997

Amended: September 3, 1999

Amended: July 18, 2001

Amended: May 5, 2005

Amended: August 6, 2010

Amended: September 29, 2011

Amended: [INSERT DATE OF AMENDMENT]

Proposed Amendments to Method 310, Determination of Volatile Organic Compounds (VOC) in Consumer Products and Reactive Organic Compounds (ROC) in Aerosol Coating Products

(Including Appendixes A and B)

1. Applicability.

1.1 This method (Method 310) applies to the determination of the percent by weight of:

(1) volatile organic compounds (VOC) in consumer products, antiperspirant and deodorant products, ~~and aerosol coatings products~~ as those terms are defined in Title 17, California Code of Regulations (CCR), Division 3, Chapter 1, Subchapter 8.5 (Consumer Products), commencing with sections 94500 and 94508, and

(2) low vapor pressure-volatile organic compounds (LVP-VOC) as that term is defined in section 94508(a), and

1.2 ~~This method (Method 310) applies to the determination of product weighted (3) the maximum incremental reactivity (PWMIR) of reactive organic compounds (ROC's) aerosol coating products, as that term is defined in Title 17, CCR, section 94521.~~

1.23 Method 310 determines the total volatile material in a product and the presence of any compounds prohibited by ARB regulations ("prohibited compounds"). Components of the product that do not meet the definition of a VOC or are exempted by ARB regulations for a specific product category ("exempt compounds") are subtracted from the total volatile material to determine the final VOC content for the product. Method 310 is also used to determine the percent by weight of the ROCs contained in aerosol coating products, for the purpose of determining compliance with the Regulation for Reducing the Ozone Formed from Aerosol Coating Product Emissions, Title 17, CCR, sections 94520 to 94528 (the "Aerosol Coatings Products Regulation").

1.34 Method 310 does not apply to the determination of the composition or concentration of fragrance components in products.

1.45 The term "Executive Officer" as used in this document means the Executive Officer of the Air Resources Board or his or her authorized representative.

2 TEST METHODS

Method 310 incorporates by reference the following ~~American Society for Testing and Materials (ASTM)~~ International, (ASTM), National Institute for Occupational

Safety and Health (NIOSH), and United States Environmental Protection Agency (US EPA) analytical test methods:

- 2.1 ASTM D 2369-01: Standard Test Method for Volatile Content of Coatings (January 10, 2001).
- 2.2 ASTM D 1426-98: Standard Test Methods for Ammonia Nitrogen in Water (December 10, 1998).
- 2.3 ASTM D 4017-96a: Standard Test Method for Water in Paints and Paint Materials by the Karl Fisher Titration Method (July 10, 1996).
- 2.4 ASTM D 3792-99: Standard Test Method for Water Content of Water-Reducible Paints by Direct Injection Into a Gas Chromatograph (May 10, 1999).
- 2.5 ASTM D 859-00: Standard Test Method for Silica in Water (determination of polymethylsiloxanes after digestion) (June 10, 2000).
- 2.6 ASTM D 3074-94: Standard Test Methods for Pressure in Metal Aerosol Containers (November 15, 1994) with the modifications found in Appendix A to this Method 310.
- 2.7 ASTM D 3063-94: Standard Test Methods for Pressure in Glass Aerosol Bottles (November 15, 1994) with the modifications found in Appendix A to this Method 310.
- 2.8 ASTM D 3064-97: Standard Terminology Relating to Aerosol Products (September 10, 1997).
- 2.9 NIOSH: Method 1400 Alcohols I (analysis of acetone and ethanol by gas chromatography). NIOSH Manual of Analytical Methods, Volume 1 (August 1994).
- 2.10 Gas Chromatography/Mass Spectrometry for Volatile Organics (analysis of exempt and prohibited compounds in the product by headspace/gas chromatography/mass spectrometry).
 - 2.10.1 US EPA Method 8240B, September 1994, Revision 2, Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS), Test Methods for Evaluating Solid Waste, Volume 1 B, Chapter 4, Section 4.3.2: Laboratory Manual Physical/Chemical Methods, SW-846, September 1994.
 - 2.10.2 US EPA Method 8260B, December 1996, Revision 2, Volatile Organic Compounds by Gas Chromatography/Mass Spectrometry (GC/MS), Test Methods for Evaluating Solid Waste, Volume 1 B, Chapter 4, Section 4.3.2: Laboratory Manual Physical/Chemical Methods, SW-846, December 1996.

- 2.11 US EPA Reference Method 24, Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings: 40 Code of Federal Regulations (CFR) Part 60, Appendix A, as it existed on September 11, 1995.
- 2.12 US EPA Reference Method 24A, Determination of Volatile Matter Content and Density of Printing Inks and Related Coatings: 40 CFR Part 60, Appendix A, as it existed on July 1, 1994.
- 2.13 US EPA Reference Method 18, Measurement of Gaseous Organic Compound Emissions by Gas Chromatography: 40 CFR Part 60, Appendix A, as it existed on September 25, 1996.
- 2.14 US EPA Method 300.7, March 1986. Dissolved Sodium, Ammonium, Potassium, and Calcium in Wet Deposition by Chemically Suppressed Ion Chromatography.
- 2.15 ASTM D 86-01: Standard Test Methods for Distillation of Petroleum Products (August 10, 2001).
- 2.16 ASTM D 850-00: Standard Test Methods for Distillation of Industrial Aromatic Hydrocarbons and Related Materials (December 10, 2000).
- 2.17 ASTM D 1078-01: Standard Test Methods for Distillation Range of Volatile Liquids (June 10, 2001).
- 2.18 ASTM D 2879-97: Standard Test Method for Vapor-Pressure-Temperature Relationship and Initial Decomposition Temperature of Liquids by Isoteniscope (April 10, 1997)-with the modifications found in Appendix B to this Method 310.
- 2.19 ASTM D 2887-01: Standard Test Method for Boiling Range Distribution of Petroleum Fractions by Gas Chromatography (May 10, 2001).
- 2.20 ASTM E 1719-97: Standard Test Method for Vapor Pressure of Liquids by Ebulliometry (March 10, 1997).
- 2.21 ASTM D 3257-06: Standard Test Methods for Aromatics in Mineral Spirits by Gas Chromatography (April 1, 2006).
- 2.22 ASTM D 3606-07: Standard Test Method for Determination of Benzene and Toluene in Finished Motor and Aviation Gasoline by Gas Chromatography (Nov. 1, 2007).
- 2.23 ASTM D 3710-95 (Reapproved 2004): Standard Test Method for Boiling Range Distribution of Gasoline and Gasoline Fractions by Gas Chromatography (Nov. 1, 2004).

- 2.24 ASTM D 5443-04: Standard Test Method for Paraffin, Naphthene, and Aromatic Hydrocarbon Type Analysis in Petroleum Distillates Through 200° C by Multi-Dimensional Gas Chromatography (Nov. 1, 2004).
- 2.25 ASTM D 5580-02 (Reapproved in 2007): Standard Test Method for Determination of Benzene, Toluene, Ethylbenzene, p/m-Xylene, o-Xylene, C9 and Heavier Aromatics, and Total Aromatics in Finished Gasoline by Gas Chromatography (Nov. 1, 2007).
- 2.26 ASTM E 1782-08: Standard Test Method for Determining Vapor Pressure by Thermal Analysis (March 1, 2008).
- 2.27 US EPA Method 602: Purgable Aromatics, 40 CFR 136 Appendix A, Method for Organic Chemical Analysis of Municipal and Industrial Wastewater (January 2008).
- 2.28 US EPA Method 625: Base/Neutrals and Acids, 40 CFR 136 Appendix A, Method for Organic Chemical Analysis of Municipal and Industrial Wastewater (January 2008).
- 2.29 US EPA SW-846 Method 8015B: Non-Halogenated Organics Using GC/FID (Rev 2, December 1996).
- 2.30 US EPA SW-846 Method 8020A: Aromatic Volatile Organics by Gas Chromatography (Rev 1, September 1994).
- 2.31 US EPA SW-846 Method 8270D: Semivolatile Organic Compounds by Gas Chromatography / Mass Spectroscopy (GC/MS) (Rev. 4, January 1998).
- 2.32 ASTM D5381-93 (Reapproved 2009): Standard Guide for X-Ray Fluorescence (XRF) Spectroscopy of Pigments and Extenders.
- 2.33 ASTM D523-08: Standard Test Method for Specular Gloss (June 1, 2008).
- 2.34 ASTM D1613-06: Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer, and Related Products (April 1, 2006).

3 CONSUMER PRODUCTS TESTING PROCEDURE

3.1 The testing begins when the Executive Officer selects a product for analysis by Method 310. The Executive Officer will maintain sample chain of custody throughout the selection and analytical process.

3.2 Initial Testing of Aerosol Products

If the sample is an aerosol product, the aerosol propellant is separated from the non-propellant portion of the product by using ASTM D 3074-94 (as modified in Appendix A for metal aerosol container) or ASTM D 3063-94 (as modified in Appendix A for glass aerosol container). The propellant portion is analyzed for exempt or prohibited compounds by using US EPA Reference Method 18. The remaining non-propellant portion of the product is then analyzed as specified in section 3.3.

3.3 Initial Testing of Non-Aerosol Products and the Non-Propellant Portion of Aerosol Products

The non-aerosol product or non-propellant portion of an aerosol product is analyzed to determine the total volatile material present in the sample and to determine the presence of any exempt or prohibited compounds. This analysis is conducted by performing the following tests:¹

- 3.3.1 Gravimetric analysis of samples to determine the weight percent of total volatile material, using US EPA Reference Methods 24/24A, ASTM D 2369-01.
- 3.3.2 Determination of sample water content. For determination of water content either ASTM D 4017-96a, or ASTM D 3792-99 may be used, or results from both procedures may be averaged and that value reported.
- 3.3.3 Determination of ammonium content using ASTM D 1426-98 or US EPA Method 300.7.
- 3.3.4 Determination of ketones and alcohol content using NIOSH Method 1400.
- 3.3.5 Analysis of exempt and prohibited compounds, if present (US EPA Reference Method 18, US EPA Method 8240B, US EPA Method 8260B, ASTM D 859-00, NIOSH Method 1400). Effective January 1, 2015, for nonaerosol "Multi-purpose Solvent" and "Paint Thinner" products sold, supplied, offered for sale, or manufactured for sale in the South Coast Air Quality Management District, analysis of exempt and prohibited compounds shall include analysis for methyl esters ~~palmitate~~ with 17 or more carbon atoms, if present.

¹ Alternate test methods may be used, as provided in section 7.0

- 3.3.6 If LVP-VOC status is claimed or the analysis indicates the presence of an LVP-VOC component and the percent VOC is not in compliance, the Executive Officer will request formulation data as specified in Section 3.5.2.
- 3.3.7 For low level VOC content samples, direct determination using US EPA Reference Method 18, US EPA Method 8240B, US EPA Method 8260B, ASTM D 859-00, NIOSH Method 1400.
- 3.3.8 For aromatic compound content determination, US EPA Method 602, US EPA SW-846 Method 8020A, US EPA Modified Method 8015, US EPA Method 625, US EPA Method SW-846 Method 8270D, ASTM D 5443-04, ASTM D 3257-06, ASTM D 3710-95, ASTM D3606-07, ASTM D 5580-02.
- 3.4 Prohibited Compounds
- If the sample is found to contain compounds prohibited by ARB regulations (i.e., ozone-depleting compounds) at concentrations equal to or exceeding 0.1 percent by weight, the Executive Officer will reanalyze the sample for confirmation.
- 3.5 Initial Determination of VOC Content
- The Executive Officer will determine the VOC content pursuant to sections 3.2 and 3.3. Only those components with concentrations equal to or greater than 0.1 percent by weight will be reported.
- 3.5.1 Using the appropriate formula specified in section 4.0, the Executive Officer will make an initial determination of whether the product meets the applicable VOC standards specified in ARB regulations. If initial results show that the product does not meet the applicable VOC standards, the Executive Officer may perform additional testing to confirm the initial results.
- 3.5.2 If the results obtained under section 3.5.1 show that the product does not meet the applicable VOC standards, the Executive Officer will request the product manufacturer or responsible party to supply product formulation data. The manufacturer or responsible party shall supply the requested information. Information submitted to the ARB Executive Officer may be claimed as confidential; such information will be handled in accordance with the confidentiality procedures specified in Title 17, California Code of Regulations, sections 91000 to 91022.
- 3.5.3 If the information supplied by the manufacturer or responsible party shows that the product does not meet the applicable VOC standards, then the Executive Officer will take appropriate enforcement action.
- 3.5.4 If the manufacturer or responsible party fails to provide formulation data as specified in section 3.5.2, the initial determination of VOC content under this

section 3.5 shall determine if the product is in compliance with the applicable VOC standards. This determination may be used to establish a violation of ARB regulations.

3.6 Determination of the LVP-VOC status of compounds and mixtures. This section does not apply to antiperspirants and deodorants or aerosol coatings products. Effective January 1, 2015, this section also does not apply to nonaerosol "Multi-purpose Solvent" and "Paint Thinner" products sold, supplied, offered for sale, or manufactured for sale in the South Coast Air Quality Management District. ~~because there is no LVP-VOC exemption for these products.~~

3.6.1 Formulation data. If the vapor pressure is unknown, the following ASTM methods may be used to determine the LVP-VOC status of compounds and mixtures: ASTM D 86-01, (Aug. 10, 2001), ASTM D 850-00, (Dec. 10, 2000), ASTM D 1078-01, (June 10, 2001), ASTM D 2879-97, ~~as modified in Appendix B to this Method 310, (April 10, 1997)~~, ASTM D 2887-01 (May 10, 2001) and ASTM E 1719-97, (March 10, 1997).

3.6.2 LVP-VOC status of "compounds" or "mixtures." The Executive Officer will test a sample of the LVP-VOC used in the product formulation to determine the boiling point for a compound or for a mixture. If the boiling point exceeds 216°C, the compound or mixture is an LVP-VOC. If the boiling point is less than 216°C, then the weight percent of the mixture which boils above 216°C is an LVP-VOC. The Executive Officer will use the nearest ~~5~~ 1 percent distillation cut that is greater than 216°C as determined under 3.6.1 to determine the percentage of the mixture qualifying as an LVP-VOC.

~~3.6.3 Reference method for identification of LVP-VOC compounds and mixtures. If a product does not qualify as an LVP-VOC under 3.6.2, the Executive Officer will test a sample of the compound or mixture used in a product's formulation utilizing one or both of the following: ASTM D 2879-97, as modified in Appendix B to this Method 310, and ASTM E 1719-97, to determine if the compound or mixture meets the definition of LVP-VOC as specified in Title 17, CCR, section 94508(a).~~

3.7 Final Determination of VOC Content

If a product's compliance status is not satisfactorily resolved under sections 3.5 and 3.6, the Executive Officer will conduct further analyses and testing as necessary to verify the formulation data.

3.7.1 If the accuracy of the supplied formulation data is verified and the product sample is determined to meet the applicable VOC standards, then no enforcement action for violation of the VOC standards will be taken.

- 3.7.2 If the Executive Officer is unable to verify the accuracy of the supplied formulation data, then the Executive Officer will request the product manufacturer or responsible party to supply information to explain the discrepancy.
- 3.7.3 If there exists a discrepancy that cannot be resolved between the results of Method 310 and the supplied formulation data, then the results of Method 310 shall take precedence over the supplied formulation data. The results of Method 310 shall then determine if the product is in compliance with the applicable VOC standards, and may be used to establish a violation of ARB regulations.

4 CALCULATION OF VOC CONTENT

This section specifies the procedure for determining the final VOC content of a product, which is reported as percent by weight of VOC. Effective January 1, 2015, for nonaerosol "Multi-purpose Solvent" and "Paint Thinner" products sold, supplied, offered for sale, or manufactured for sale in the South Coast Air Quality Management District (SCAQMD) the final VOC content is reported as grams of VOC per liter of material (g/L) as set forth in section 4.2.4.

4.1 Aerosol Products

- 4.1.1 For aerosol products, except those containing LVP-VOC, the percent VOC content shall be calculated using the following equation:

$$\% \text{ VOC} = \frac{\text{WL} (\text{TV} - \text{A} - \text{H} - \text{EL}) + \text{WP} - \text{EP}}{\text{WL} + \text{WP}} \times 100$$

Where²:

WL = weight (gm) of the non-propellant portion, excluding container and packaging.

TV = weight fraction of non-propellant total volatile material.

A = weight fraction of ammonia (as NH₄) in the non-propellant portion.

H = weight fraction of water in the non-propellant portion.

²Alternate test methods, as provided in section 7.0, or appropriate approved methods from section 2.0 may be used.

EL = weight fraction of exempt compounds in the non-propellant portion.

WP = weight (gm) of propellant.

EP = weight (gm) of exempt compounds in propellant.

4.1.2 For aerosol products containing LVP-VOC, the percent VOC shall be calculated using the following equation:

$$\% \text{ VOC} = \frac{WL [(1-H) \times (1-LVP) - EL] + (WP - EP)}{WL + WP} \times 100$$

Where:

LVP = weight fraction of LVP-VOC compounds and/or mixtures in the non-propellant, non-aqueous portion.

1 - H = weight fraction of the non-propellant portion that does not contain water.

1 - LVP = weight fraction of the non-propellant, non-aqueous portion that is volatile.

4.2 Non-Aerosol Products

4.2.1 For non-aerosol products, except those containing LVP-VOC, the percent VOC content shall be calculated using the following equation:

$$\% \text{ VOC} = (TV - A - H - EL) \times 100$$

4.2.2 For non-aerosol products containing LVP-VOC, the percent VOC shall be calculated using the following equation:

$$\% \text{ VOC} = [(1-H) \times (1-LVP) - EL] \times 100$$

4.2.3 For Fabric Softener – Single Use Dryer Product, the grams of VOC per sheet shall be calculated as follows:

$$\text{Total Grams VOC per Sheet} = \frac{S - R}{S} \times D \quad \underline{(TV - A - H - EL) \times WS}$$

$$\underline{\text{Total Grams VOC per Sheet with LVP} = [(1-H) \times (1-LVP) - EL] \times WS}$$

Where:

S = mass, in grams, of the dryer sheet sample.

~~R = mass, in grams, of sample residue by gravimetric analysis.~~

~~D = mass, in grams, of the single dryer sheet.~~

WS = weight of single dryer sheet in grams

4.2.4 Effective January 1, 2015, for nonaerosol "Multi-purpose Solvent" and "Paint Thinner" products sold, supplied, offered for sale, or manufactured for sale for use in the SCAQMD, grams of VOC per liter of material (g/L) shall be calculated using the following equation:

$$\frac{\text{g/L VOC} = \text{WM} \times (\text{TV} - \text{H} - \text{EL})}{\text{VM}}$$

Where:

WM = weight of the material in grams.

VM = volume of the material in liters.

TV = weight fraction of total volatile material.

H = weight fraction of water.

EL = weight fraction of exempt compounds including the weight fraction of methyl palmitate esters with 17 or more carbon atoms in the total volatile material.

4.3 Consumer products subject to low VOC limits (below 5.0%) may have their VOC content characterized by a low level direct determination.

4.3.1 For aerosol products the percent VOC content may be calculated using the following equation:

$$\% \text{ VOC} = \frac{\text{WL} \left[\sum V_n \right] + \text{WP} - \text{EP}}{\text{WL} + \text{WP}} \times 100$$

Where:

V = weight fraction of non-exempted ~~volatile organic compounds~~ VOCs in the non-propellant portion.

n = number of non-exempted ~~volatile organic compounds~~ VOCs in the non-propellant portion.

WL = weight (gm) of the non-propellant portion, excluding container and packaging.

WP = weight (gm) of propellant.

EP = weight (gm) of exempt compounds in propellant.

- 4.3.2 For non-aerosol products the percent VOC content shall be calculated using the following equation:

$$\% \text{ VOC} = \left[\sum V_n \right] \times 100$$

5 TESTING TO DETERMINE REACTIVE ORGANIC COMPOUNDS (ROC) IN AEROSOL COATING PRODUCTS

This section specifies the procedure for determining the percent by weight of the reactive organic compounds (ROC) contained in aerosol coating products, for the purpose of determining compliance with the Aerosol Coatings Products Regulation.

- 5.1 The testing begins when the Executive Officer selects a product for analysis. The Executive Officer will maintain sample chain of custody throughout the selection and analytical process. When a product is selected for testing, the Executive Officer will request the product manufacturer or responsible party to supply the product formulation data specified in Title 17, CCR, section 94526(b)(21). The manufacturer or responsible party shall supply the requested information within ~~40~~ 25 working days. Information submitted to the Executive Officer may be claimed as confidential; such information will be handled in accordance with the confidentiality procedures specified in sections 91000 to 91022, Title 17, CCR.

5.2 Initial Testing of the Propellant Portion of Aerosol Coating Products

The aerosol propellant is separated from the non-propellant portion of the product by using ASTM D 3074-94 (as modified in Appendix A for metal aerosol container) or ASTM D 3063-94 (as modified in Appendix A for glass aerosol container). The propellant portion is analyzed for ~~reactive organic compounds~~ ROCs and other compounds by using US EPA Reference Method 18. The remaining non-propellant portion of the product is then analyzed as specified in section 5.3.

5.3 Initial Testing of the Non-Propellant Portion of Aerosol Coating Products

The non-propellant portion of the product sample is analyzed to determine the ~~reactive organic compounds~~ ROCs in the sample, including the presence of any prohibited compounds. This analysis is conducted by performing the following tests:³

- 5.3.1 Gravimetric analysis of samples to determine the weight percent of total volatile material, using US EPA Reference Methods 24/24A, ASTM D 2369-01.
- 5.3.2 Determination of sample water content. For determination of water content either ASTM D 4017-96a, or ASTM D 3792-99 may be used, or results from both procedures may be averaged and that value reported.
- 5.3.3 Determination of ammonium content using ASTM D 1426-98 or US EPA Method 300.7.
- 5.3.4 Determination of ketones and alcohol content using NIOSH Method 1400.
- 5.3.5 ~~Analysis~~ Direct determination of reactive organic compounds ROCs and, if present, prohibited compounds (US EPA Reference Method 18, US EPA Method 8240B, US EPA Method 8260B, ASTM D 859-00, NIOSH Method 1400, and modified ASTM D 5443-04).
- 5.3.6 Determination of metal content using ASTM D5381-93 (2009).
- 5.3.7 Determination of specular gloss using ASTM D523-08.
- 5.3.8 Determination of acid content using ASTM D1613-06.

5.4 Prohibited Compounds

If the sample is found to contain compounds prohibited by the Aerosol Coatings Products Regulation (e.g., ozone-depleting compounds) at concentrations equal to or exceeding 0.1 percent by weight, the Executive Officer will reanalyze the sample for confirmation.

5.5 Initial Determination and Verification of ~~Reactive Organic Compound~~ ROC Content

The Executive Officer will determine the ~~reactive organic compound~~ ROC content by verifying formulation data pursuant to sections 5.2 and 5.3. Only those components with concentrations equal to or greater than 0.1 percent by weight will be reported.

³ Alternate test methods may be used, as provided in section 7.0

- 5.5.1 Based on manufacturer's formulation data and the analysis conducted under section 5, the Executive Officer will make an initial determination of whether the product meets the applicable requirements specified in the Aerosol Coatings Products Regulation. If initial results show that the product does not meet the applicable requirements, the Executive Officer may perform additional testing to confirm the initial results.
- 5.6 Final Determination of ~~Reactive Organic Compound~~ ROC Content
- If a product's status is not satisfactorily resolved under section 5.1 - 5.5, the Executive Officer may conduct additional analyses and testing as necessary to verify the formulation data.
- 5.6.1 If the Executive Officer is unable to verify the accuracy of the supplied formulation data, then the Executive Officer will request the product manufacturer or responsible party to supply additional information to explain the discrepancy.
- 5.6.2 If the additional information supplied by the manufacturer or responsible party shows that the product does not meet the applicable requirements, then the Executive Officer will take appropriate enforcement action.
- 5.6.3 If the manufacturer or responsible party fails to provide additional information as specified in section 5.6.1, the initial determination of ~~reactive-organic compound~~ ROC content under section 5.1 – 5.5 shall determine if the product is in compliance with the applicable ~~reactive-organic compound~~ reactivity limits. This determination may be used to establish a violation of the Aerosol Coatings Products Regulation.
- 5.6.4 If there exists a discrepancy that cannot be resolved between the results of Method 310 and the formulation data or additional information supplied by the manufacturer or responsible party, then the results of Method 310 shall take precedence over the supplied formulation data or additional information. The results of Method 310 shall then determine if the product is in compliance with the applicable requirements, and may be used to establish a violation of the Aerosol Coatings Products Regulation.

6 METHOD PRECISION AND ACCURACY

- 6.1 The precision of Method 310 for determining VOC content was evaluated using seven representative products with known volatile organic compound (VOC) contents ranging from 6.2 to 81.2 percent VOC by weight. Each sample was divided into six portions, and each portion was separately analyzed to determine the VOC content. Based on the results of this analysis, the 95 percent confidence interval for Method 310 is 3.0 percent by weight (Wt/Wt%).

- 6.2 For determining the percent by weight of the individual ingredients in aerosol coating products, the precision and accuracy of the determination for each ingredient is governed by the precision and accuracy of the test method used to ascertain the percent by weight of each ingredient.

7 ALTERNATE TEST METHODS

Alternative test methods which are shown to accurately determine the concentration of VOCs or constituent components in antiperspirant/deodorants, consumer products, or aerosol coating products (or their emissions) may be used upon written approval of the Executive Officer.

Method 310 - Appendix A

PROPELLANT COLLECTION PROCEDURES

1 APPLICATION

The procedure applies to modify ASTM D 3074-94 and D 3063-94 to allow collection of the propellant for analysis and density measurement for metal aerosol containers and glass aerosol containers, respectively. These modified procedures also retain the aerosol standard terminology listed in ASTM D 3064-97.

2 LIMITATIONS

Nitrogen analysis: Nitrogen may be used as a component of the propellant system. Ambient air is 78 percent nitrogen and may be present as a contaminant in the system prior to sample collection. This is eliminated by sweeping out any connecting lines to the Tedlar bag with product before starting sample collection. This procedure will eliminate or reduce nitrogen contamination to less than 0.1% by weight of the sample and the analysis of the propellant gas will be unaffected.

3 APPARATUS AND MATERIALS

- 3.1 Propellant Collection System: See Figure 1 (metal containers) and Figure 3 (glass containers).
- 3.2 Tedlar Bags equipped with slip valve and septum
- 3.3 Density Measurement
 - 3.3.1 250 mL gas dilution bulb, or
 - 3.3.2 Density/Specific gravity meter meeting the following minimum specifications:
 - 3.3.2.1 Measurement Range: 0 – 3 +/- 0.00001 g/cm³
 - 3.3.2.2 Measurement Temperature Range: 4°C ~ 70°C.
- 3.4 Balance, capable of accurately weighing to 0.1 mg
- 3.5 Sample Venting Platform. See Figure 2 (metal containers)¹ and Figure 4 (glass containers)².

¹ ~~The metal piercing adaptor is available from Mid-West Screw Products, Inc., 3523 North Kenton Ave., Chicago, IL 60641. Interim Part Number: 8013A-3/4 45TAPER REV. The gasket is available from Alltech Associate 2051 Waukegan road, Deerfield, IL 60015, part number 80-16. See SOP SAS05, Figures 3 and 4.~~

3.6 Platform Shaker, equivalent to Thermolyne M49125

3.7 Cork Rings, 80 x 32 mm

4 PROCEDURE

4.1 Propellant Collection for Metal Aerosol Containers

4.1.1 Close valves on Propellant Collection System (see Figure 1).

4.1.2 Remove the actuator from valve on the aerosol can and weigh can to the nearest 0.01 g.

4.1.3 Place the can in an inverted position onto the Sample Venting Platform, stabilized by cork rings.

4.1.4 Slowly raise the hydraulic jack until the can is pierced. Note the pressure of the can.

4.1.5 Vent the can until propellant is seen flowing from output 1. Collect the propellant in the Tedlar bag from output 1. Density is determined from this same Tedlar bag, as necessary.

4.1.6 After the propellant is collected, close and remove the Tedlar bag and vent the remainder of the propellant.

4.1.7 After the flow ceases from the can, it is removed from the assembly and allowed to vent overnight on a platform shaker, to vent the remainder of the propellant.

4.1.8 Reweigh the can to the nearest 0.01 g~~m~~ and record weight loss (total g~~rams~~ propellant). The can may now be opened for analysis of the non-propellant portion of the sample.

4.2 Propellant Collection for Glass Aerosol Containers

4.2.1 Remove the actuator from valve of the aerosol glass container and weigh container to the nearest 0.01 g~~m~~.

4.2.2 With container in an inverted position place the valve onto the tapered adaptor.

² ~~The glass aerosol tapered adaptor is available from Armstrong Technologies, Inc. 12780 Earhart Ave., Auburn, CA 95602. See SOP SAS05, Figure 7.~~

- 4.2.3 Pressurize the air cylinder to actuate the sample container valve onto the tapered adaptor. Note the pressure of the sample container.
- 4.2.4 Open the sample valve and collect propellant sample into the Tedlar bag. Density is determined from this same Tedlar bag, as necessary.
- 4.2.5 After the propellant is collected, close and remove the Tedlar bag and vent the remainder of the propellant.
- 4.2.6 Continue to vent the container on the platform assembly until no pressure registers on the sample gauge and there is no visible propellant flowing from the sampling tube.
- 4.2.7 Remove the container from the platform.
- 4.2.8 ~~Loosen and remove~~ Punch a small hole into the container valve assembly.
- 4.2.9 Place the container on a platform shaker to vent the remainder of the propellant.
- 4.2.10 Reweigh the container and valve assembly to the nearest 0.01 g~~m~~ and record weight loss (total grams propellant). The non-propellant portion of the sample is ready to be analyzed.

FIGURE 1

PROPELLANT COLLECTION SYSTEM

METAL AEROSOL CONTAINER

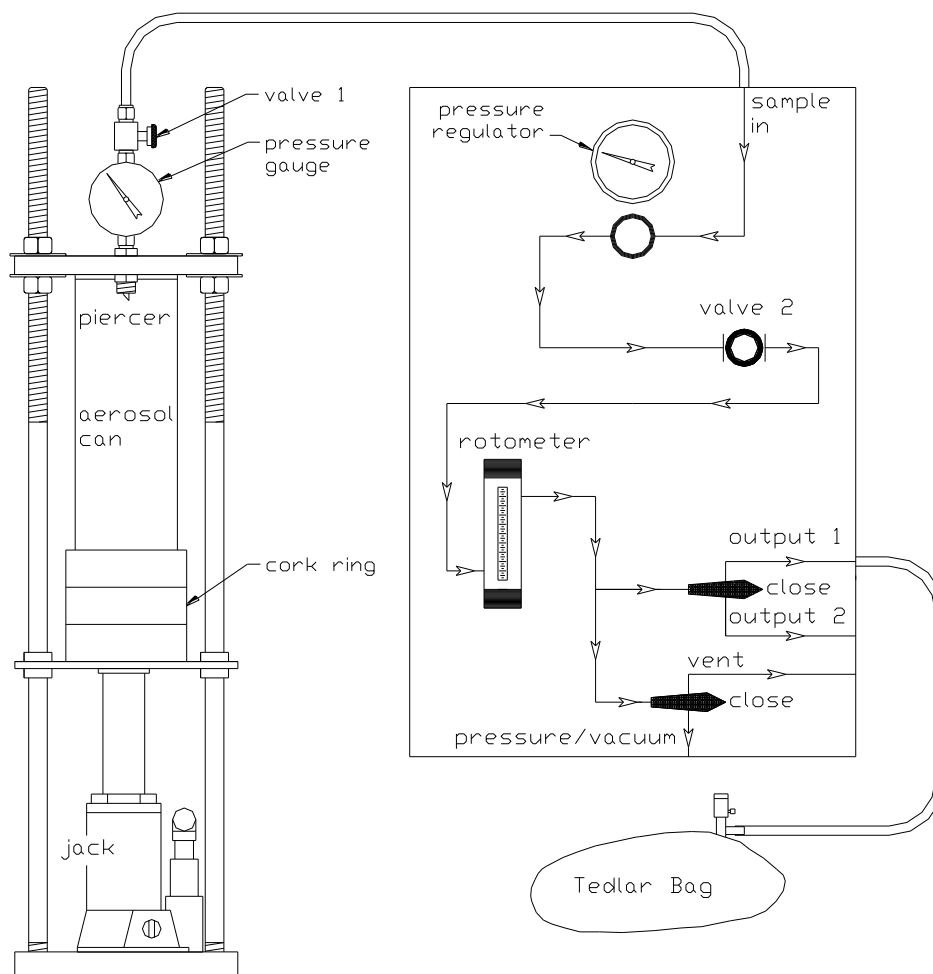


FIGURE 2

SAMPLE VENTING PLATFORM METAL AEROSOL CONTAINER

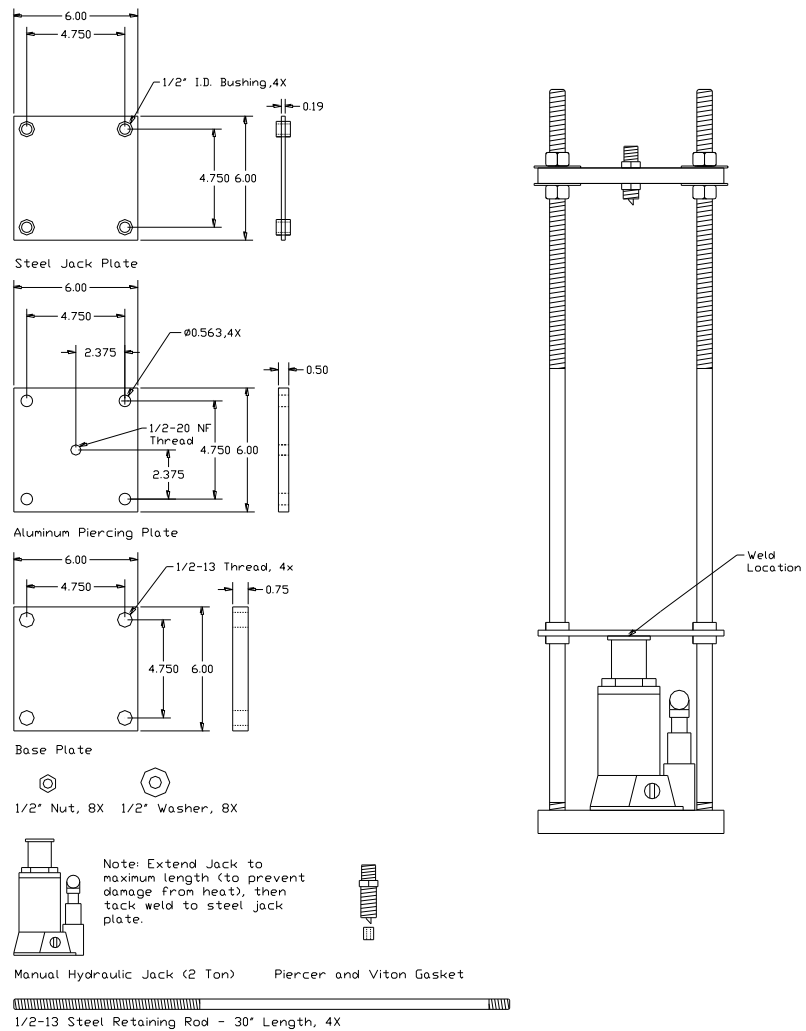


FIGURE 3

PROPELLANT COLLECTION SYSTEM

GLASS AEROSOL CONTAINER

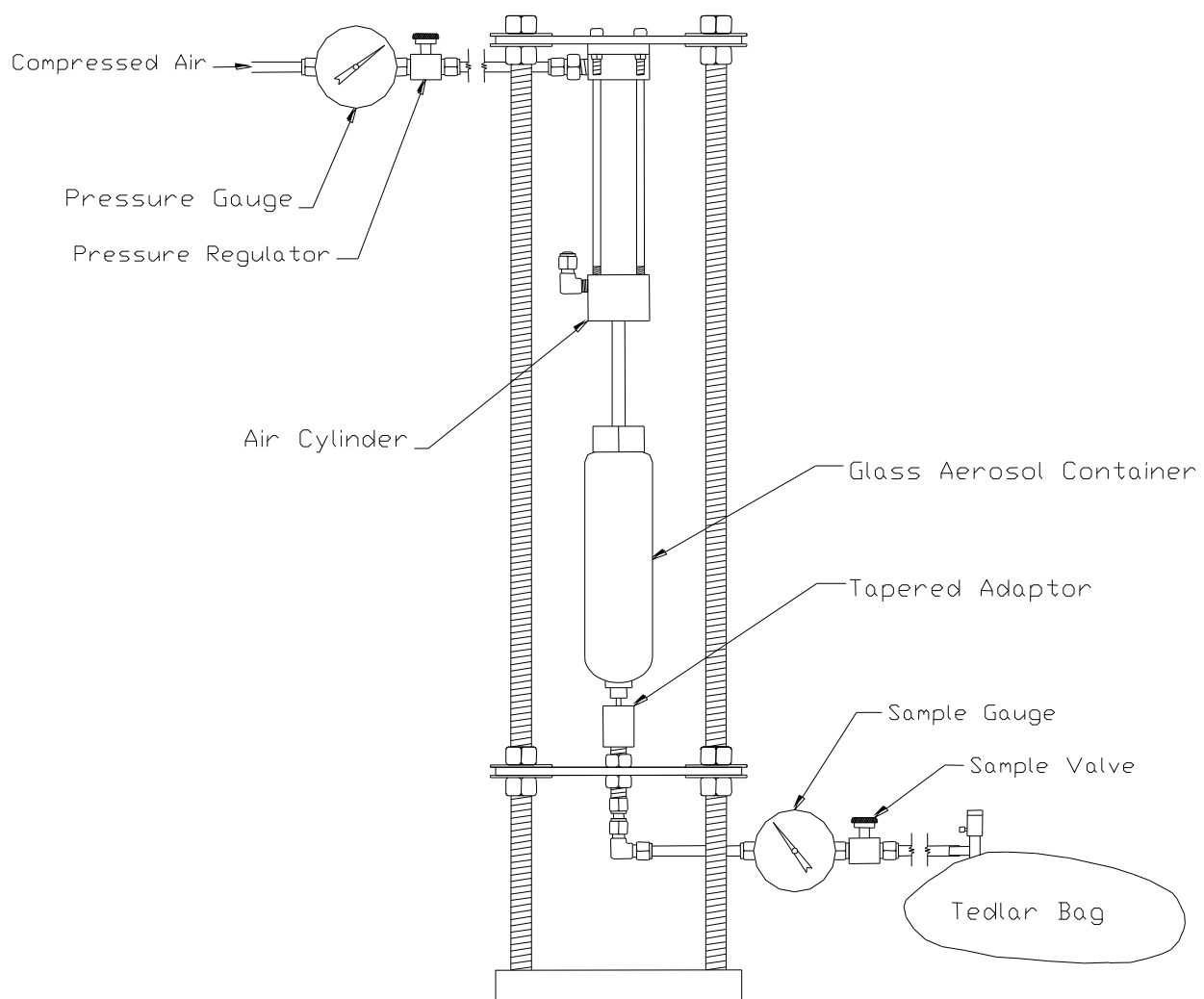
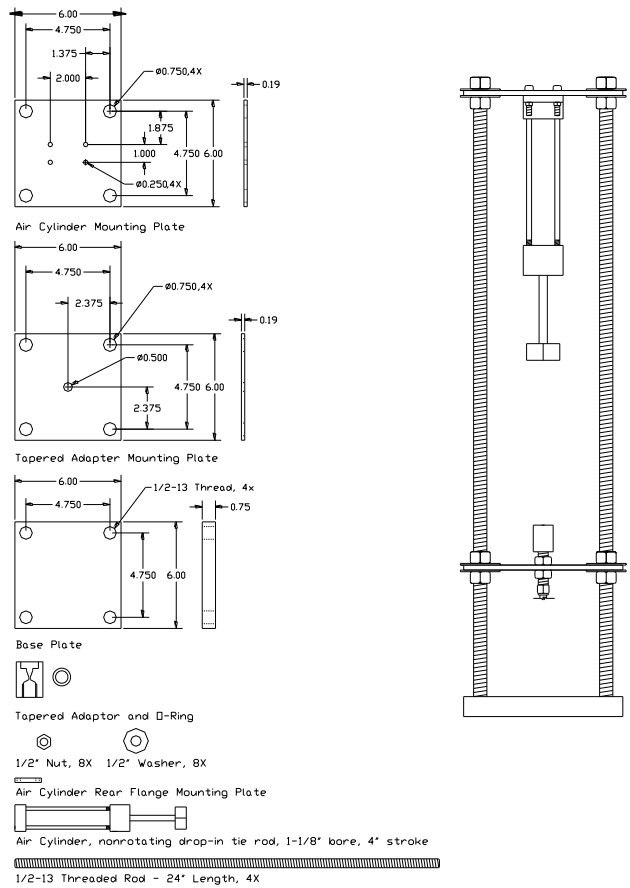


FIGURE 4

SAMPLE VENTING PLATFORM
GLASS AEROSOL CONTAINER



~~Method 310 – Appendix B~~

~~MODIFICATIONS to ASTM D-2879-97~~

~~This procedure modifies ASTM D-2879-97 as follows:~~

~~1. Modifications to the isoteniscope apparatus include:~~

- ~~a. capacitance manometers and digital readout~~
- ~~b. manifold system made of stainless steel and modified in design~~
- ~~c. Ultra-torr fittings and Ultra-torr flex-lines~~
- ~~d. ballast on the vacuum side of the isoteniscope manifold as depicted in ASTM D 2879-97 schematics, has been removed.~~
- ~~e. stainless steel liquid nitrogen trap (Cold Trap)~~
- ~~f. stainless steel high vacuum valves~~
- ~~g. recirculating cooling system (required for extremely low pressure work only)~~
- ~~h. diffusion pump (required for extremely low pressure work only)~~
- ~~i. hot ion cathode vacuum gauges (required for extremely low pressure work only)~~

~~2. A purge and degassing procedure consisting of lower pressures and a liquid nitrogen bath replaces the step of lightly boiling the sample as outlined in ASTM D 2879-97.~~

~~3. Purge and Degassing Cycle~~

- ~~a. With the U-tube connected, the system is evacuated to approximately 1.0 mm Hg. This readily removes most of the higher volatility gases from the sample.~~
- ~~b. The stainless steel, liquid nitrogen cold trap is filled. The manifold is now brought to approximately 300 mm Hg with the purified nitrogen, regulated through the needle valve.~~
- ~~c. The isoteniscope tube is carefully placed into a Dewar of liquid nitrogen. The ½ atmosphere pressure of nitrogen prevents the sample from splashing while being frozen. After the sample freezes, the system is evacuated to 0.05 mm Hg.~~
- ~~d. The U-tube is removed from the Dewar, secured and allowed to warm to room temperature. The U-tube bulb head should be angled so the~~

dissolved gases will be readily evacuated as the frozen sample starts to melt. When gases build up, it may be necessary to tilt the U-tube to release the gases.

- e. Repeat the freeze and degas process once, reducing pressure each time to less than 0.05 mm Hg. After the sample has returned to room temperature, close valve #3. There should be minimal dissolved gases left once the frozen sample starts to melt. Tilt the tube to release any gas pockets (if necessary). Do not push nitrogen into the evacuated space between the sample in the arm and the sample in the reservoir. At this point, if the sample is properly degassed, a “natural break” should form in the sample. This creates a vapor space as the liquid level in the bulb leg of the manometer falls to a quasi-equilibrium position, usually with the fluid level higher in the long manometer leg. If there is no pendulum effect, and the liquid level in the long leg of the manometer is significantly higher than the level in the short leg (> 2 mm), degassing is probably incomplete, and the degassing procedure should be repeated.

4. Data Evaluation

The regression based on the plot of Log P vs. 1/T as outlined in ASTM D 2879-97 has been removed and replaced with a nonlinear regression to generate the coefficients for an Antoine equation. The data analysis procedure assumes that the measured pressure is the sum of the compound's vapor pressure and a residual fixed gas pressure. The vapor pressure's dependence on absolute temperature is represented by an Antoine expression, and the fixed gas pressure is directly proportional to absolute temperature as outlined in ASTM 2879. This leads to the model equations:

$$P_{\text{model}} = P_{\text{vapor}} + P_{\text{fixed gas}}$$

$$P_{\text{model}} = B0 * 10^{(B1 / (T + B2))} + B3 * T$$

where T is the absolute temperature (K) and B0, B1, B2 and B3 are coefficients to be determined via a nonlinear regression which minimizes the sum of squares

$\sum (P_{\text{meas}} - P_{\text{model}})^2$ for all experimental data points. The vapor pressure at 20° C is then calculated as:

$$P_{\text{vapor}}(293.15 \text{ K}) = B0 * 10^{(B1/(293.15 + B2))}$$

With a set of pressure vs. temperature measurements, the nonlinear regression can be performed using a statistical software packages. The following constraints are imposed to obtain meaningful Antoine equation coefficients for low vapor pressure samples:

- a. Pressures shall be measured at temperatures ranging from room temperature to about 180° C. Narrower ranges will not provide sufficient information to determine the Antoine curvature, i.e., B2 coefficient. Wider ranges can lead to experimental difficulties maintaining the vapor space in the isoteniscope. A minimum of 12 points is necessary to provide ample degrees of freedom for the calculations.
- b. Initial pressures at room temperature shall be less than 1 mm Hg. Higher values are indicative of significant levels of dissolved fixed gases. These will vaporize during the course of the experiment as temperature is increased and invalidate the model's assumption for the fixed gas contribution.
- c. $-235 \leq B_2 \leq 0$. Positive values of B2 imply that the heat of vaporization of the substance increases with increasing temperature. Thermodynamic data for many compounds suggests this is unrealistic. Large negative values can lead to unrealistically low vapor pressure values coupled with excessive fixed gas contributions. The -235(K) bound is chosen to be consistent with literature values of B2 for many pure compounds. For hydrocarbons in the LVP-VOC range, $B_2 \geq -100$ provides reasonable agreement between measured and literature vapor pressures.
- d. The fixed gas coefficient, B3, should normally be ≥ 0 .

Figure 1

**ISOTENISCOPE VAPOR PRESSURE MEASUREMENT
APPARATUS**

